Our ref: Q210454
Your ref: BC080001
Email: [redacted]@quod.com
Date: 4 August 2021

Kath Haddrell
Case Manager
National Infrastructure Planning
Temple Quay House, 2 The Square
Bristol, BS1 6PN

For the attention of Kath Haddrell
By Email

Dear Kath,

Application by London Resort Company Holdings for an Order Granting Development Consent for the London Resort

I write on behalf of Ebbsfleet Development Corporation, Dartford Borough Council and Kent County Council (the LAs) to provide an update on the progress of the ongoing discussions with the London Resort Holdings (the applicant).

We are instructed as the planning advisors for the LAs for the remainder of the DCO process, taking over the role from Paul McKim who handled previous correspondence and performed this role; Mr McKim has moved onto other projects.

The LAs are working hard with the applicant to resolve the issues raised in our Relevant Representation, along with a number of ongoing discussions that have taken place since.

A number of important points remain under active discussion and we remain hopeful that constructive progress can be made before the start of Examination. As indicated in your letter dated 29th July 2021, the applicant is expecting to submit a number of new and updated documents towards the end of November. We understand that this is to address a number of comments Interested Parties, including those raised by the LAs. The key points to highlight include:

- **Schedule of updated and new documents**: As set out in the applicants latest schedule (dated June 2021), a substantial amount of new and additional information is expected to be submitted by the applicant in 'late November' (per the applicant's letter of 21 July). Except for the Schedule, the LAs have not had sight of any further details of the scope or nature of that material and it remains unclear as to whether this information will address the concerns raised by the LAs.
- **Clarification and Additional Assessment Request**: On the 17th May 2021 a request was made by the LAs to the applicant to provide a series of clarifications and additional assessment material that was required to allow the LAs to undertake a meaningful assessment of the proposals. We have yet to receive confirmation from the applicant if it intends to respond to this request, but we remain hopeful that the submission made in

November may go some way in addressing these issues. We attach a copy of those requests for information which we hope is useful. We are working through these issues with the applicant through ongoing discussions with a view to seek agreement where this is possible.

- **Level of Detail / Approach to Flexibility**: It is acknowledged that an appropriate degree of flexibility can be appropriately secured through the NSIP regime, however it is also recognised that it is still necessary to ensure that Interested Parties are provided with sufficient information in order to allow them to undertake a meaningful assessment of the proposals and understand if any proposed mitigation is adequate and appropriate to mitigate impacts arising from the project. It is noted that the LAs acknowledge the issues raised by the Examining Authoring in the letter dated 9th July and have raised similar questions to the applicant and the applicant has confirmed that it expects to update and reduce their parameters in order to address some of the concerns raised.
- **Transport Modelling:** It is understood that the applicant is undertaking further assessment work in relation to traffic modelling, which will help inform our discussions over the transport mitigation package needed for the project.
- **Swanscombe Peninsula SSSI**: On the 11th March 2021 Natural England notified Dartford Borough Council, Ebbsfleet Development and the Secretary of State for Environment, Food and Rural Affairs that the boundary of the SSSI was enlarged under Section 28C of the Wildlife and Countryside Act 1981 to include more land of special scientific interest. These changes took immediate effect, with representations due on the confirmation of that change due by 12th July. The SSSI designation represents a significant change in the planning context of the site and it is clear to the LAs that greater clarity is required in terms of the potential impacts of the proposals on the SSSI and the mitigation and compensation proposals. We are hopeful that the late November submission will include a level of detail and assessment that is proportionate to the extent of potential significant impacts on Swanscombe Peninsula SSSI
- **Statements of Common Ground**: It is noted that the applicant has not yet commenced discussions regarding the Statement of Common Ground and the LAs are acutely aware that such documents play a vital role in managing the Examination process, ensuring that areas of agreement and disagreement are clearly recorded.

We remain hopeful that the above matters can be resolved, providing that all parties continue to engage in proactive and constructive dialogue. We note that the Examining Authority has indicated that it is minded not to make a procedural decision on the start of the Examination until the Examining Authority has had sight of the applicant's submission in November and the Examining Authority has previously indicated that the earliest date Examination could start would be the 18th October. The LAs agree that it is very necessary to review the additional information before making this important procedural decision. It is the LAs view that the period before formal Examination starts must provide the LAs and Applicant with sufficient time to review the new material, undertake the Local Impact Report(s), and allow, where possible, the reaching of a greater level of agreement on the important

matters raised in Relevant Representations and in the Examining Authority's Initial Assessment of Principal Issues. We are therefore of the view that in the unique circumstances of this application there should be an extended pre-Examination period that allows all parties to continue to constructively engage and seek agreement. A potential Examination start date no earlier than February 2022 would, the LA's think, provide a challenging but achievable deadline for the parties to work together. Any earlier would, in the LA's view, not be realistic and would not allow for an efficient or procedurally appropriate Examination for all parties, including the applicant, LA's, statutory and other consultees and the wider public. The approach to this revised programme prior to the start of the Examination is summarised as follows:

- **Requirements and Obligations: August onwards:** We are holding regular meetings with the applicant in order to reach a great level of agreement on the emerging draft requirements and the S106 obligations.
- **Review of Consultation Material: Late October**: We understand that an informal, targeted consultation will be undertaken by the applicant, which would include some of the draft documents.
- **Submission of new and updated documents: Late November:** The scope of the new and updated documents appears extensive and need to be understood to allow the Local Impact Report to be drafted.
- **Draft Local Impact Report: August to February 2022:** Whilst progress has been made on the draft LIR, it is recognised that the forthcoming submission from the applicant will include a great deal of new and updated information. Meaningful progress on the LIR is therefore dependent on having sight of the applicant's updated submission.
- **Statement of Common Ground: October to February 2022:** We are keen for the SoCG process to commence as soon as practicable and expect that this will be possible once the applicant has completed the new and updated application documents.
- **Preliminary Meeting / Examination Begins: February 2022 onwards:** The above would then allow the Examination to begin.

We recognise that this would represent an unusually extended period for the pre-Examination stage, however the circumstances of the project are unique and are clearly justified given the issues raised in this project, the SSSI designation and the general pandemic resource pressures on all parties. The NSIP regime is intended to be front-loaded and sufficient time to allow an efficient and procedurally appropriate Examination and to complete this work and the outstanding dialogue with the applicant would be wholly consistent with the principles enshrined in the Planning Act 2008 regime.

Please do not hesitate to contact me if you wish to discuss any of the matters raised in this letter. I look forward to hearing from you.

Yours sincerely,

Matt Sharpe

Board Director

enc.
1. Clarification and Additional Assessment Request

cc.

Mark Pullin, Ebbsfleet Development Corporation
Sonia Collins, Dartford Borough Council
Rob Hancock, Kent County Council
Richard Ford, Pinsent Masons LLP

LONDON RESORT COMPANY HOLDINGS DCO SUBMISSION
RELEVANT REPRESENTATIONS SUBMISSIONS

Clarifications and Additional Assessment Information Requests

Following the submission of a joint relevant representation by Dartford Borough Council (DBC), Ebbsfleet Development Corporation (EDC) and Kent County Council (KCC) (collectively "**the Authorities**") in relation to London Resort Company Holdings' ("**LRCH**" or the "**Applicant**") application for a Development Consent Order (DCO) in relation to land within the Authorities' administrative boundaries, a schedule of further information requests distilled from the relevant representation is provided below.

The aim of this document is to assist the Applicant in responding to technical matters raised and perceived deficiencies in the original application submission. The Authorities would want to see the issues raised in this document addressed in the future submissions log submitted by the Applicant referred to in the Examining Authority's Procedural Decision made by letter dated 5 May 2021. This will help provide some confidence and reassurance that the matters identified have been considered by the Applicant and responded to during the extended pre-examination phase.

	Master-Planning and Design	Clarification	Additional Assessment Information
1.	Clarification sought on how the access road will pass through and mitigate the impact of severance on the masterplan in Station Quarter North of the Ebbsfleet Central Masterplan. Construction details, including consideration of decking across the access road, to preserve connectivity and screen the access road from the central area is required in order to understand the impacts on the Ebbsfleet Central masterplan delivery.	✓	
2.	Housing quality: Clarification sought on the mechanism that would ensure that all dwellings would meet the nationally described space standards. To ensure policy compliance.	✓	
3.	Housing quality: Clarification sought on the mechanism that would ensure that all dwellings would meet the GLA requirements 12 /13 (access to private outdoor space). To ensure policy compliance.	✓	
4.	Housing quality: Clarification sought on the mechanism that would ensure that all dwellings would at least meet M4 Part 2 accessibility standards. To ensure policy compliance.	✓	
5.	Housing Quality: Insufficient detail provided on design principles, requirements and standards that will be applied to ensure the staff accommodation provide an appropriate quality of dwelling in alignment with Dartford's policy framework for high quality housing, Clarification required on what design standards (beyond minimum space standards, outdoor space and accessibility) will be used to define a minimum quality level for all dwellings within the development scheme. To ensure policy compliance and to ensure the delivery of quality housing that is adaptable in the future if required.	✓	
6.	Range of housing typologies: Clarification required on the mix of dwelling sizes and type of dwellings to be provided within the development scheme to support a broad range of potential employees. To understand if the Local Plan Housing mix requirement is met.	✓	
7.	Masterplanning of staff accommodation: Insufficient design principles established within Design Code to inform the masterplanning of staff accommodation and ensure it delivers high quality, attractive and healthy homes, streets and neighbourhood. Clarification should be provided of the opportunities and constraints analysis for the staff accommodation site, and how the master planning principles therefore respond to this analysis. For example the orientation of the units and understanding of adequate daylight and sunlight can be provided and distances between blocks needs to be understood.	✓	

8.	Design character: Clarification sought within the design code on how the local design narratives will be applied to the 6 building character typologies in sufficient detail to ensure it can be used as an evaluation framework at the detailed design stage. Information requested to ensure the design language and place making has some context to the local area.	✓	
9.	Activation of route from Ebbsfleet International : Clarification sought how the route between the Ebbsfleet International Station and the Resort transport interchange will be animated and activated, what uses are proposed to provide passive surveillance to ensure a safe and secure route at all times of the day.	✓	
10	Resort Car Parks: Clarification of how the resort parking structures could be accommodated into the landscape without resulting in visual harm. More detailed massing studies required to make this evaluation.		✓
11	Station Parking Structures : Clarification of how the parking structures serving the Ebbsfleet International Railway Station can be located to minimise traffic movements within the local road network within the Ebbsfleet Central development area, to ensure delivery of masterplan alongside the new access route to London Resort.	✓	
12	London Resort Port: Clarification is n**eeded** o**n the** width of the green corridor that passes between the London Resort Port and Gate 1. Needs to provide clarification of how the wildlife corridor can be provided alongside the proposed pedestrian and cycle links.	✓	
13	Gate 2 back of House: Insufficient detail provided on the layout, massing and general design of the gate 2 back of house areas. Clarification is sought through the provision of appropriately detailed design principles to provide an evaluation framework for Work 9b.	✓	
14	Gate 2 western boundary: Clarification of design strategy and proposed approach for mitigating the visual impact and noise from gate 2 for residents on the western boundary of work 2.	✓	
15	Public Art: Clarify details of how public art projects will be procured and delivered.	✓	
16	Access Road: Clarification required of the inclusion of a planted central reservation to access road. To meet the EDC design criteria in Public Realm Strategy.	✓	
17	Routes and Roads Type A and I: Clarification that all cycle track and footpaths meet the minimum width as set out in the public realm strategy, with all 2 way cycle tracks being min 3m in width.	✓	
18	Routes and Roads Type F: Clarification that structural planting will be provided to a height of at least 1m along the access road and that will be secured by a requirement in the DCO.	✓	

19	Clarification of provision of footpath / cycleway to the west of the access road through proposed tunnel under the A2260. To ensure connections are maintained.	✓	

	ES Land Use and Socio-Economics	**Clarification**	**Additional Assessment Information**
1.	The certainty and appropriateness of the embedded mitigation (on-site accommodation) for potential temporary effect of employment generation on the accommodation market is unclear. More certainty is needed to understand if the embedded mitigation measures proposed are appropriate and deliverable.	✓	
2.	The certainty of embedded mitigation for temporary and permanent potential effect of workers and visitors on healthcare provision is unclear. The capacity is required to understand impacts.		✓
3.	No mitigation is specified for adverse effect (on residents and homes) of the potential impacts of visitors and workers on local accommodation options and the housing market supply in the immediate area. There is no commitment to monitoring or consideration of most vulnerable groups. The impact on local housing need and delivery is therefore not fully understood.	✓	
4.	It is not clear why demand for education is not considered for off-site workers in the assessment of *potential effect of workers and visitors on other public services.* The impact of the development on local education services can therefore not be properly assessed.		✓
5.	A statement regarding the process through which 'additional mitigations' were identified and developed is needed in order to understand if the proper assessments have been carried out.	✓	
6.	As currently stated, the 'additional mitigations' (Table 7.41) commitment to ongoing engagement with displaced businesses, and assistance for businesses with relocation options, including working with SELEP and Locate in Kent to understand available space and the Property Compensation Policy set out in Chapter 7 (to offset adverse effects of potential temporary or permanent displacement/loss of businesses and other services) are ambiguous and uncertain. Greater clarity is required to ensure the proposed mitigation approach is sustainable and will have the mitigatory effects relied upon in the assessment.	✓	

	ES Land Use and Socio-Economics	Clarification	Additional Assessment Information
7.	Table 7.41. There is no certainty surrounding the effectiveness of the Construction Method Statement on construction workforce-induced increases in crime levels. Nor is there a commitment to monitoring crime levels to inform whether further mitigation is necessary or appropriate.	✓	
8.	The potential effects of visitor and worker expenditure are not harnessed. i.e., how to maximise worker expenditure locally to understand the overall benefits of the proposed scheme.	✓	
9.	(7.288) Little or no detail is provided on the mechanism(s) by which supply chain opportunities will be maximised. Nor is there any commitment to targeting these potential benefits on local businesses. More detail on how supply chain opportunities will be maximised at all stages of the value chain should be included. This might also recognise that these opportunities are not just 'linear' (i.e. London Resort as the purchaser of goods and services); they ought to be circular and embedded (i.e. London Resort benefits from a vibrant local creative economy).		✓
10	7.18) The socio-economic consequences of other matters – most especially traffic and congestion – linked to the construction and operational phases are not considered within Chapter 7. The (separate) transport assessment suggests limited effects. Given the scale, this seems surprising, and the Local Authorities will want reassurance on this matter, including in relation to the socio-economic consequences (on, for example, local businesses that might be affected by construction-related traffic). Either Chapter 7 should provide justification of why an assessment of these effects is not included in the assessment, or an assessment of the socio-economic effects of traffic and congestion should be included in Chapter 7.		✓
11	(7.18) The land use and socio-economic effects assessed in Chapter 7 are narrow in focus. This is particularly significant because of the scale of the proposed development.	✓	
12	(7.48) Although there is an assessment of the availability of the construction workforce, this is insufficient in detail. It is possible that some of the construction jobs required by the London Resort are highly specialist. Given the scale of the London Resort, it may be the case that it increases demand for construction workers in certain specialist roles, thereby adversely affecting the supply of these workers for other projects regionally, nationally and possibly internationally.		✓

	ES Land Use and Socio-Economics	Clarification	Additional Assessment Information
13	Estimates of net additional jobs created by the proposed London Resort in 2038 vary from 12,000 to 21,600 jobs at Labour Catchment Area (LCA) level - this is a big range. The socio-economic consequences, and therefore the required mitigations of those very different numbers of additional jobs, vary greatly (particularly if the effective LCA is understood in more nuanced terms). In addition, the socio-economic consequences of indirect jobs do not appear to have been given due attention in the assessment of wider socio-economic effects. The scale of the benefits arising from the scheme is not defined.		✓
14	Table 7.5. The size of the LCA and the significant skewing effect of London make it difficult to understand the labour market and therefore assess effects in relation to the local labour market less persuasive. It would be helpful to have (a) more acknowledgement of the limitations, etc., and potentially use of localised case studies, but also (b) a clear reflection of the consequences of those limitations in terms of mitigation.	✓	
15	There is no reference to various important macro-economic and geopolitical factors. One example is the implications of the UK's departure from the EU and what that might mean for labour supply. This additional information is required in order to understand impacts of migrant and seasonal workers.		✓
16	The assessment of displacement as it relates to trade diversion in Chapter 7 tends to rely on an assumption that London Resort represents (7.316) *'a unique global attraction that is likely to generate new trips rather than diverting from existing theme parks in the UK'*. The evidence underpinning what exactly is unique about the offer aside from its scale is not clear. The scale of the proposed facility is such that displacement must be a consideration and further clarification is required in order to properly evaluate impacts**.**	✓	
17	Further consideration of displacement at a local and sub-regional level should be demonstrated in Chapter 7 in the form of evidence through robust case studies of similar schemes and information on how the attraction can evolve and change to demand trends required to understand the credibility and robustness of the business model.	✓	
18	The full effects of the London Resort are uncertain, partly because there are few precedents for a facility of this scale. Given the scale of the employment and visitor numbers the embedded mitigation need to be subject to a higher degree of certainty. In addition, there is a need for a commitment to active and intelligent monitoring – through both construction and operational phases – and a commitment to respond fully to further need for mitigations.		✓

	ES Land Use and Socio-Economics	Clarification	Additional Assessment Information
19	More certainty should be given to the contents of the gates and the area outside the payline when possible and an assessment of displacement at a local level should be undertaken again at that stage. If the content of the London Resort is to change in the future, the assessment should be repeated. The monitoring of local displacement where possible would provide insight around whether specific businesses are being adversely affected and if additional mitigations are appropriate. Funding to resource additional mitigations should they be required should be identified. Chapter 7 should include a recognition that the mitigations required at different geographies will vary.	✓	
20	Explanation of the Cumulative Effects Assessment in Chapter 7 is thin and unclear. More detail should be provided around the methodology and scope underpinning the cumulative assessment in the body of Chapter 7 (it is noted that some further detail is provided in Appendix 7.2 – Detailed methodology).	✓	
21	*"Potential temporary effect of the construction workforce on local healthcare".* Embedded mitigations for this effect lack certainty. Given the constraints on local healthcare outlined in the baseline, it is essential that the effect on healthcare provision at each relevant geography is monitored and reviewed and that sufficient resource is made available to do so. It may also be appropriate for some consideration to be given to additional mitigations that might provide further reassurance that adverse effects will be avoided.		✓
22	*"Potential effect of workers and visitors on healthcare provision".* The assessment relies on a commitment to ongoing collaborative working with the CCG and an assumption that local services will be able to respond and absorb additional demand. The evidence for this, particularly as it relates to the tax base, is unclear. There is also limited detail around the onsite medical facility (7.232). In light of the uncertainty the adequacy of healthcare provision should be monitored to determine when and what additional mitigations may be necessary to address harm on local services.		✓
23	There may well be health effects that are relevant to multiple chapters. One example is the effects of the construction and operation of London Resort on the wellbeing of local residents for example in relation to air pollution and congestion. These effects have implications for both socio-economics and health. A clearer indication of what effects are considered in which document would help to illustrate to the reader which effects have been covered and where the relevant detail can be found.	✓	

	Outline Employment and Skills Strategy (the Strategy)	Clarification	Additional Assessment Information
1.	Given that the London Resort is a nationally significant project, the Applicant should be using the Strategy to set much more aspirational overall objectives, along with specific targets for the delivery of local employment, apprenticeships, work placements, engagement with schools etc. We require further information on how, and when, the Applicant will provide a more detailed Employment and Skills Strategy which includes targets and key performance indicators which are appropriately matched to the scale of the proposed development.		✓
2.	The Applicant acknowledges in Paragraph 3.2 of Appendix TA-C: London Resort Staff Distribution Note that the London Resort would fundamentally change the local labour market. Given the significance of the anticipated changes to the labour market, it is surprising that the Strategy does not explain the implications of the scheme on the current balance of demand and supply for key skills in the labour market. We require further information from the Applicant on how the scheme will affect the operation of the labour market, with a particular focus on those sectors where existing skills shortages are likely to be exacerbated in order to fully understand the impacts and benefits of the scheme.		✓
3.	Table 4.2 of the Strategy suggests that up to 29% of the construction workers are expected to travel from the Core Study Area (CSA) of Gravesham (10%), Dartford (9%) and Thurrock (10%). The remaining 71% of construction workers are expected to travel from elsewhere in Kent, Essex and London. What assessment has the Applicant made of the numbers of construction workers that are expected to travel to the site on Monday and return home on Friday having stayed in temporary accommodation during the working week? This has implications for local housing supply.	✓	
4.	Table 11 in Appendix TA-C: London Resort Staff Distribution Note shows that by 2037 during the peak season, 65% of operational staff are expected to travel from the Core Study Area, broken down as follows: Gravesham (26%); Dartford (18%); Thurrock (9%); and the on-site accommodation (12%). The remaining 35% of operational staff are expected to travel from elsewhere in Kent and boroughs in south east London. Why is a higher proportion of operational staff expected to travel from Gravesham rather than from Dartford during both the low and peak seasons from 2037 onwards?	✓	
5.	Paragraph 6.5 of the Strategy states that the Applicant will *"provide sufficient information about supply chain benefits to local businesses, residents and other key stakeholders through both the construction and operational phases of the development.* Additional information and a more systematic assessment is required from the Applicant to better understand the supply chain opportunities that they anticipate arising during the construction and operational phases and thus help define the benefits.		✓

	What will be the key sectors in which supply chain opportunities will arise? What might the value of those opportunities be? How does the Applicant propose contacting and maintaining a meaningful dialogue with relevant local suppliers? How will the Strategy seek to maximise supply chain opportunities for the creative sector?		
6.	Objective 4 of the Strategy focuses on "Celebrating diversity and inclusion" which explains in very broad terms that the Applicant will work with the Taskforce to identify vulnerable and underrepresented groups to make employment opportunities accessible to them. However, the Strategy does not provide any specific programmes or mechanisms to explain how the Applicant would deliver on these broad aspirations. Further information is required on how the Applicant proposes working with the local authorities to identify a key set of priority groups is required in order to better understand how the 'inclusion' agenda will be delivered..		✓
7.	Appendix A to the Strategy outlines provisional terms of reference for the Employment and Skills Taskforce. The overall aims and objectives of the Taskforce are broad brush, with an emphasis on "exploring and informing", as well as sharing best practice. Paragraph 7.9 of the Strategy states that the Taskforce is intended to be an advisory panel rather than having any decision-making powers. We require further clarification from the Applicant on how the performance of the Taskforce will be measured and monitored. What specific objectives and targets will be set for the construction and operational phases of the development. And how will progress against those targets be assessed?	✓	
8.	Figure 5-2 of the Strategy summarises the Applicants pledges on employment and skills. The pledges are very short on specific commitments, either to the funding of skills and training or to the delivery of specific targets. The **London Resort Skills Academy** is one of the Applicant's key pledges and will be central to the long term success of the Strategy. The Strategy provides no details on this pledge. We require more evidence on the Applicant's proposals for the Academy, including more details on what type of training would be provided, in which locations and by which providers in order to better understand if the mitigation measures are appropriate.		✓
9.	Chapter 6 of the Strategy outlines the Applicant's approach on implementation. There are very few specifics, with only vague references to the "developing nature of this strategy.". Paragraph 6.5 explains that the Applicant will develop key performance indicators which reflect the pledges and give quantitative goals for their achievement, including the delivery of a target number of construction apprenticeship starts for each year of the construction phases. The Strategy is silent on when a more detailed Employment and Skills Strategy will be made available. It is also silent on when the Applicant will provide an Implementation Plan. We require further clarification from the Applicant on their overall approach to implementation. What key performance indicators will the Applicant commit to meeting and on when they will provide the Implementation Plan. What will the Implementation Plan cover and over what timeframe?	✓	

	Public Rights of Way	Clarification	Additional Assessment Information
1.	The Access, Rights of Way and Public Rights of Navigation Plans do not appear to give an indication on status (e.g. footpath, bridleway etc.) of routes from Ebbsfleet International Station to ferry/port which is required in order to understand the Applicant's proposals.	✓	
2.	Continuous route through site incorporating the public footpaths DS31 and DS12 not shown on the Access, Rights of Way and Public Rights of Navigation Plans	✓	
3.	Re-alignment of DS1/NU1 onto England Coast Path not shown and realignment of ECP further back from river proposed (see Natural England RR page 4) does not consider mitigation for potential impacts on other relevant environmental features or health and safety risks associated with past use of the site. Also National Trails, such as the ECP, should be protected and enhanced in line with paragraphs 98, 168 and 170 of the National Planning Policy Framework (See Natural England RR pages 4, 36 – 9.1, 9.3, 9.4, 9.5. The Applicant is asked to clarify its proposals in this regard.	✓	
4.	The Authorities would welcome the change in status of DS1/NU1 from footpath to bridleway or cycleway to allow use by cyclists.	✓	
5.	Suitably binding measures relating to delivery and maintenance of public rights of way affected by the Applicant's proposals is required.	✓	
6.	Appropriate binding mechanisms are required to manage and minimise closures during construction of public rights of way, in particular, the timetable envisaged for works to the access road requiring temporary closure of DS17/NU2.	✓	

7.	Provision of alternative, and easy access for the less-abled routes, including the England Coastal path, during construction should be detailed in the outline CEMP. An agreed, evidence-based assessment of the operational phase impacts of the development on the public right of way network should be of a sufficient level of detail such that the suitability and deliverability of the proposed alternative prow access arrangements can be confirmed.	✓	
8.	Inclusion of PRoW users in locations of noise sensitive receptors (APP-338)	✓	
9.	Lack of detail and consistency between plans showing PRoW should be addressed through further consultation between the Applicant and KCC.	✓	
10.	Greater network connectivity & sustainable transport possibilities - Use of PRoW by resort guests should be addressed through signage from resort hotels and to Bluewater and other local facilities (as requested by Basildon Council in its relevant representation). Extending car parking for river services to Rainham to increase network connectivity (London Borough of Havering).	✓	
11.	It is not clear how the impact of construction traffic using International Way & resort access road, on pedestrians and cyclists has been considered in the assessments.		✓
12.	Improve pedestrian access from Swanscombe Station to the London Resort via DS31 and crossing infrastructure (See Network Rail relevant representation paragraph 3 2.8).	✓	
13.	Provide pedestrian link between Northfleet Station and Ebbsfleet International Station, particularly in view of potential Crossrail.	✓	
14.	Is any parking for visitors wishing to use the public right of way network proposed at either project site? If not, there may be congestion on local residential roads. (page 20 of Thurrock Council relevant representation).	✓	
15.	Provision for covered secure cycling parking is only 250 places over both project sites. Where and how will it be distributed and phased?	✓	
16.	What consideration has been given to a cycle hire scheme?	✓	

	Highways and Transportation	Clarification	Additional Assessment Information
1.	**Land Transport – Construction** The Authorities are concerned with the lack of information provided in the Construction Traffic Management Plan (APP-128), required to determine the impact on the local highway network.	✓	
2.	Additional peak hour assessments are required along with a sensitivity assessment, allowing for a proportion of workers arriving and departing during the typical network peak hours on Mondays and Fridays and a lower vehicle occupancy. This is required to have confidence in the Applicant's assessment.		✓
3.	A sensitivity assessment assuming a smaller target of river-based material has been undertaken in the ES (Paragraph 9.404 APP-058), however, the Authorities are concerned that none of the additional trips appear to have been distributed south of the river on the Kent network as this is unrealistic. Further assessment is required to determine whether there is a significant impact on the local highway network.		✓
4.	There is a concern that construction staff could travel to work using private vehicles and park on neighbouring streets. Further details on how this can be mitigated are required.	✓	
5.	**Land Transport – Transport Assessment (APP-093)** One of the fundamental issues with the application that causes the Authorities concern is the lack of assessment of the local road network. This includes both the modelling itself and the assumptions that underpin it. The Authorities do not consider the trip attraction and mode share information contained within the Transport Assessment to be sufficient to support a robust assessment. Only one junction has been modelled on the local highway network and this scope is not considered to be appropriate. Further information is required of the Applicant to understand its rationale behind this apparent omission. Additional junction capacity assessments are required using a cordon of the new Kent Highway Model in order for the highway Authority to determine whether there is a significant impact on the local highway network.	✓	✓

	Highways and Transportation	Clarification	Additional Assessment Information
6.	An 8-9 AM and 5-6 PM peak hour weekday assessment has been provided, yet no assessment has been provided of the shoulder peaks (relevant in this congested part of Kent), the resort peak hour, or the weekend peak. Once the assumptions have been agreed, a further assessment should be undertaken using a cordon of the new Kent Highway Model which will allow an assessment of the local road network and further peak hours.		✓
7.	The traffic flow diagrams in Appendix TA-R of the Transport Assessment (APP-116 6.2.9.1 ES Ap 9.1) do not show where traffic routed east on the A2 travels to. This is a significant concern and further modelling is required to enable the Authorities to assess the impact on the network and ensure appropriate mitigation is secured.		✓
8.	While the Applicant has shared spreadsheets showing details of the trip generation calculations with the Authorities it is not yet clear what assumptions underpin the calculations and therefore there remains considerable uncertainty around the likely trip attraction and additional information is required to satisfy the Authorities that the assumptions are appropriate and robust.	✓	✓
9.	No assessment has been undertaken for nonwork-related trips to / from the staff accommodation site for the 2000 staff living off London Road. This is required to determine whether there is a significant impact on the local network for all modes.		✓
10.	No details have been given for the proposed tunnel between the Craylands staff accommodation site and the main resort site.	✓	✓
11.	The Transport Assessment: Appendix TA-H Stakeholder Advisory Technical Document (SATD) (APP-106) provides sole purpose visitor profiles across the day for the RD&E and Waterpark. However, no assessment has been undertaken to demonstrate their impact on the local highway network.		✓
12.	A car park accumulation has been provided but has not been broken down between the two sites. The Authorities are not convinced that the assumption that all vehicles coming from the north will park on the northern side of the river Thames at the Essex Project Site, is realistic when the majority of the parking is located on the Kent Project Site south of the Thames. Further information is required to demonstrate that this is realistic, as otherwise, this is likely to have a significant effect on the local highway network.		✓

	Highways and Transportation	Clarification	Additional Assessment Information
13.	The baseline mode shares for staff and visitor travel shown in Tables 8.1 and 8.2 of the Transport Assessment are too simplistic given the mode share estimates are predicted to change over time between 2025 and 2038 and also on different days such as the average day, 85th percentile day and peak day. An updated framework for baseline data should be provided in the Travel Demand Management Plan (document reference APP-127).		✓
14.	Despite references made to an Events Management Plan, one has not been provided. It is unclear whether this is an accidental omission or whether the Applicant considers these matters are addressed in the Travel Demand Management Plan (APP-127) instead. If it is the former, one should be provided in order for the Authorities to determine whether there is a significant impact, and if it is the latter, the Travel Demand Management Plan does not consider how travel demand will be managed on peak days, and the measures are lacking in sufficient detail to give the Authorities confidence that they are deliverable. Further information is required to ensure that it could bring about any meaningful impact.		✓
15.	Changes to the layout of the crossing at the A226 London Road / High Street / Pilgrims Road junction have been proposed, yet no further information has been provided. It is unknown whether the design will accommodate the levels of pedestrians and cyclists anticipated or whether the capacity of the junction will be negatively affected. Given that this junction is proposed to be the main off-site pedestrian and cyclist connection to the London Resort, expected all-mode flows, junction capacity modelling, swept paths and a Road Safety Audit are required for review.		✓
16.	The Authorities are concerned with the level of the servicing and delivery vehicles trip generation forecasted, as it is very low. The trips are based on commercially sensitive data and it would be preferable if some 'real-world' evidence could be provided to enable these figures to be validated.		✓
17.	The Transport Assessment does not include an assessment of the proposed Visitor Centre and Staff Training Facility located to the west of the staff accommodation, with the London Resort Academy located immediately south (as per Figure 2.4 of the Design and Access Statement). It is unclear how these will be accessed; what parking provision is proposed and what the associated trip attraction would be on the local highway network.		✓
18.	The ES Transport Assessment and appended Rail Strategy contain no evidence of the effects of resort passenger traffic on rail network operations taking into account its capacity and reliability. No mitigations are specified in respect of the rail network aside from Ebbsfleet International		✓

	Highways and Transportation	Clarification	Additional Assessment Information
	station. No evidence is given of the Memorandums of Understanding with Network Rail, HS1 Ltd and South Eastern despite reference to them having been appended. Given the omissions, it is not possible to understand whether the effect of the resort would be significant without mitigation and therefore whether mitigations are required.		
19.	The proposal includes ancillary on site amenities at the staff accommodation site, likely to consist of a shop and a gym. The Authorities are concerned that these facilities are trip generators in their own right and will affect the local highway network, yet these trips have not been included in the trip generation assessment, undermining the reliability of its conclusions.		✓
20.	Table 8 in the Transport Assessment: Appendix TA-U Rail Strategy Plan (document reference APP-119) shows that peak rail departures occur between 22:00 and 23:00. The Authorities query whether there is sufficient rail and station capacity to accommodate this demand when existing services are typically less frequent and are therefore concerned that the assessment and dDCO will not be able to accommodate the envisaged level of trips.		✓
21.	Paragraph 1.3.3 of the Transport Assessment: Appendix TA-U Rail Strategy Plan (document reference APP-119) states “An independent capacity study by an HS1-approved third-party supplier (on an existing framework) is being commissioned…”. The Authorities require the output of this assessment with sensitivity testing related to modal shift to be submitted to the examination to enable it to be appropriately considered by the Authorities and other interested parties and necessary mitigation secured.		✓
22.	Paragraph 4.1.10 of the Transport Assessment: Appendix TA-V Bus Strategy Plan (document reference APP-120) refers to passenger demand during the 85th%ile day and peak days, yet no peak day assessment has been provided to demonstrate appropriate provisions is available / will be provided.		✓
23.	Paragraph 9.1.2 of the Transport Assessment: Appendix TA-V Bus Strategy Plan refers to improvements that are anticipated to be made on the network. Further information and appropriate mitigation measures are required in respect of the list.		✓

	Highways and Transportation	Clarification	Additional Assessment Information
24.	The Bus Strategy Plan provides for the introduction of the People Mover. However, no plans have been seen in the event of disruption to either the people mover itself or to the key rail lines from London.		✓
25.	Transport Assessment: Appendix TA-W Uber Boats by Thames Clipper Operation Proposal (APP-121) refers to the Uber Boats service. Further information is required together with appropriate development consent order requirements or development consent obligations to ensure a smooth transition between transport modes is secured.		✓
26.	The Authorities do not agree with the conclusion of Table 9.3 which states *"…The traffic is shown to predominantly use the Strategic Road Network … The level of impact upon the SRN is minimal. Once off the SRN, the traffic is dispersed sufficiently not to require any further assessment…"* In the absence of more detailed assessment of local linkages, the Authorities are unable to confirm with any degree of certainty that the effects are not significant.		✓
27.	The traffic flows in Appendix 9.3 (APP-131) suggests that the percentage increase on each link is less than 10%, however, an appropriate assessment of the local road network has not been undertaken. For example, no interpeak assessment has been undertaken, which, as this is the resort's peak hour, is important and the failure of the Applicant to carry out the interpeak assessment results in the Authorities being unable to confirm that the impacts to KCC's local highway network as a result of the scheme are acceptable.		✓
28.	Paragraph 9.79 (APP-058) refers to up to 2,500 staff being accommodated on site. However, it is understood that the accommodation is to provide for up to 2000 staff. This difference will impact the trip generation assessment and should be clarified. It is of critical importance that the Applicant confirms its proposals for staff accommodation and assesses the impacts appropriately.	✓	
29.	Figure 9.3 (App-231) has omitted a number of relevant receptors and the Authorities are concerned that the impact of the London Resort on these receptors has not been assessed. The assessment should be updated to include these receptors and the Resort's impact upon them. *Paragraph 9.118 of the Environmental Statement Volume 1: Main Statement Chapter 9 – Land transport Document reference: 6.1.9, and Figure 9.3 Sensitive Receptors (document reference 6.3.9.3) relate to receptors. The study area is not identified on figure 3, but should include the*		✓

	Highways and Transportation	Clarification	Additional Assessment Information
	links covered by the model. Figure 3 does not include some of the identified receptors e.g existing schools in Dartford, International Way as a ped/cycle commuter route between Eastern Quarry and Ebbsfleet international, the National Cycle route which crosses the A2 Ebbsfleet junction, London Road with the provision of 2000 London Resort staff who will not have vehicles so will need to walk, cycle and catch public transport, nor does it include the receptors of the committed developments identified including the primary and secondary school on Eastern Quarry, the Stone Lodge secondary school and the GP and sports facilities at Stone Pit 1. These should be included".		
30.	Paragraph 9.128 (APP-058) states "*It is generally accepted that a link/junction approaches its theoretical capacity between 90-100% (i.e. Level of Service E) and overcapacity with values over 100% (i.e. LoS F).*". KCC consider this to be an appropriate assumption for signal-controlled junctions but priority-controlled junctions should be assessed at 85% capacity, as per the accepted industry standard. Any junction assessments contained within this ES should reflect this and any junctions that breach these thresholds (85% RFC for priority junctions / 90% PRC for signal junctions) will require appropriate mitigation to bring them back to within capacity (if the future base scenario shows they are currently operating within capacity) or to the same RFC / PRC observed in the future base scenario (if currently operating above capacity) i.e. 'nil detriment'.		✓
31.	At paragraph 9.139 (APP-058) the Applicant has stated that "*only changes in the delay of 15% or more on a link with LoS E or F are significant in the EIA terms*". KCC disagrees with this assumption because a change of less 15% on a significantly congested link / junction could result in a severe impact and could therefore be considered significant. It is unclear why no standard junction capacity modelling has been undertaken to support this assessment, as is normally undertaken for planning applications under the Town and Country Planning Act 1990 and this is required in order for the Authorities to determine whether the impact is significant or not.		✓
32.	Paragraphs 9.29, 9.33 and 9.35 of the ES (APP-058) refer to the Bus Strategy, Rail Strategy and Off site Car Parking Plan respectively. Given the significant volume of trips predicted to use public transport, and the likelihood of staff and visitors parking on street, KCC consider these strategies key to achieving the traffic levels assessed in the Transport Assessment. It is therefore disappointing that there is no mechanism in the draft DCO to require compliance with the limited measures envisaged in these documents. The Authorities require the Applicant to develop these		✓

	Highways and Transportation	Clarification	Additional Assessment Information
	documents to a satisfactory standard and will require compliance with those measures to be secured by way of a DCO requirement.		
33.	Tables 9.470, 9.472 and 9.473 of Chapter 22 of the ES (document reference APP-071) show the mitigation of impacts to the local highway network, the bus strategy and the rail strategy (respectively) will be secured though the Transport Assessment. However, KCC have not been provided with enough information to demonstrate that no additional mitigation is required and there is no legally enforceable mechanism in the draft DCO to ensure compliance with these measures. Until those measures are secured, the conclusions of the assessment cannot be relied upon.		✓
34.	KCC have previously raised concerns about the layout of the site access junction, which have not been fully addressed. A key concern is the lack of a Road Safety Audit, which would typically be produced even at this outline level of design detail. Consequently the Authorities are currently unable to conclude that the design of junction is safe or appropriate.		✓
35.	Figure 10.10 shows a dotted line for staff vehicle access to Galley Hill Road at the existing junction with Lower Road. It is unclear what this access is for and what the number of anticipated vehicle movements will be on the local road network. Further information should be provided.	✓	
36.	Figure 10.4 shows the perimeter road to accommodate a bus link. Further details of the perimeter road should be provided, to demonstrate how buses can be accommodated and how inappropriate parking will be discouraged by design. It is unclear how a link onto Craylands Lane would be managed, nor how buses would link to Ingress Park, presumably via a limited access gate.		✓
37.	**River Transport - Construction** KCC is concerned about an absence of detail about how the construction phase will be managed in respect of proposed developments at Tilbury Port and potential impacts on the volumes of river traffic.	✓	
38.	It is proposed to build a new pontoon at Tilbury Port to accommodate the proposed Park and Glide service. However, no works management plans are provided and the Authorities would like to understand this detail in order to be assured that there will be no adverse impact of the Gravesend to Tilbury Ferry or its passengers	✓	

	Highways and Transportation	Clarification	Additional Assessment Information
39.	It is indicated that a significant proportion of goods and materials will arrive at the London Resort site by river mitigating impacts on the local road network. The Authorities require information on what analysis has been completed about the volume of movements that this will add to this part of the Thames in order to provide an assurance that there is no restriction on the passage of the ferry.		✓
40.	**River Transport Operational** One of the key sustainability features for the resort is a significant modal share for river transport services in the form of new services from the City and that servicing a new Park and Glide facility at Tilbury. However, details on some of the assumptions and how services will be secured and provided remain unclear. Forecasts show that 15% of visitors will arrive at the Resort using the direct river service from the City. This share is fundamental to mitigating the highway impact and therefore information is sought as to how this figure has been estimated.		✓
41.	The river transport strategy identifies that the development will provide two new river services; the direct service from the city and the proposed Park and Glide service providing connections for 2,500 parking spaces located at Tilbury. However, there is no indication that the provision of these services will be underwritten by the applicant in the form of revenue support for any operator. It is assumed that the passenger volumes and associated passenger revenue will be sufficient to sustain the services and the details of these calculations are needed.		✓
42.	The proposed Park and Glide service will represent another, intensive operation that would need to be accommodated on the current Port of Tilbury Landing stage. It is proposed to provide a new pontoon as part of the development works here but the detail of this and how it relates to existing facilities is not clear. It is noted that the strategy undertakes to manage this and refers to positive discussions with Port of Tilbury and with the current GtTF operator. The absence of detail about how capacity and any new pontoon would be designed and managed in a way that didn't inhibit access for the current GtTF which accesses a dedicated V-Berth on the inside of the landing stage is unclear and greater, more detailed information is required.		✓

	Highways and Transportation	Clarification	Additional Assessment Information
43.	Analysis of the current Gravesend to Tilbury Ferry service reveals 20 incidents of service disruption in a 12 month period relating to extreme weather and yet there is no evidence of this being considered. In the absence of a mitigation plan, this could act as a disincentive to using the Park and Glide service in particular. There could be significant and unexpected demands placed on alternative modes such as road, bus and rail creating a negative impact, if not for the river services then for these alternative modes and so it is necessary to understand what consideration has been made of this and what mitigation might be in place to manage such an event.		✓
44.	The Gravesend to Tilbury Ferry service is the most intensive operation on this part of the Thames, crossing the river 4 times in any hour 6 says per week from 0540 to 1910. The increase in river traffic in the form of the proposed Park and Glide service has identified an increased risk of collision and is therefore of particular concern for the GtTF service. A detailed passage plan formed in conjunction with all stakeholders to ensure that none of the operations are compromised is necessary.		✓
45.	The application seeks development consent for a number of "highways". No details have been provided to indicate what highway will be publicly maintainable by the various Highway Authorities, both during enabling works, construction and operation of The London Resort. As the Highway Authority for Kent, Kent County Council has an obligation to assure the safety of the highway user. Therefore, it is imperative to understand what highways Kent County Council will be taking responsibility for as part of the development. Details of what highway is to be publicly maintainable at various stages of the development is required and appropriate contractual arrangements will be required in relation to any roads being to adoptable standard, with appropriate security and commuted sums to account for maintenance.	✓	
46.	**Appendix 17.2 Surface Water Drainage Strategy (document reference APP-189) Figure 3.4 Page 36** – It does not appear to show the highway drainage system serving Tiltman Avenue and a part of Manor Way. We understand this system links with Thames Water Surface Water Sewers which also serve drainage along London Road. This passes into the proposed development but is not shown on the existing utilities Kent Project Site. We believe this may connect into the existing watercourses within the sub catchment. It is important to retain this drainage or divert it appropriately in consultation with the Local Highway Authority to avoid increased flood risk local to the development.	✓	

	Highways and Transportation	Clarification	Additional Assessment Information
47.	**Chapter 4 – page 77 item 4.66** – Should the proposed access road be offered for adoption by the Local Highway Authority, the proposed concrete box culverts for catchment D of the access road will require technical approval from the Highway Authority due to the size. The Authorities require these to be located outside of the Highway (carriageway) areas. The Authorities will seek appropriate protective provisions to ensure that it is able to carry out is functions as LLFA appropriately in connection with the proposed DCO.	✓	
48.	**Chapter 4 – page 79 – item 4.73** – Any adoptable Highway Drainage systems cannot take any private surface water from building or private land unless the flows into it are f via a surface water sewer adopted by a sewerage undertaker under section 115 of the Water Industry Act 1991. If any areas of the drainage system for the access road are proposed for adoption then connection can be made via that mechanism; the Applicant must clarify its proposals to ensure that the surface water drainage system for the Access Road is appropriately designed and maintained.	✓	
49.	**Document reference 2.15 – Highway Drainage Layout (Drawing References LR-PL-WSP-DCP-2.15.1 to LR-PL-WSP-DCP-2.15.9)** - Details of the highway drainage design for the Access Road are required together with confirmation that the applicant proposes for such assets to remain its liability to maintain (i.e. the road and its drainage will remain private and are not proposed to be adopted by KCC).	✓	
50.	Clarification within the DCO that the Highways Authorty approval for highway works will be subject to the relevant s38/s278 approval and agreement procedure.	✓	

	Ecology and Biodiversity	Clarification	Additional Assessment Information
1.	The Environmental Statement has not assessed the impacts to the newly designated SSSI. It is currently not understood what mitigation and compensation is required and a meaningful assessment of mitigation off site has not been provided. The ES needs to be updated to take account of the SSSI.		✓
2.	Ecological Surveys. Survey information is not sufficient for all species and/or habitats. Inadequate survey data means the assessment is unlikely to fully identify the impacts of the proposal and therefore identify the necessary types and scale of mitigation and compensation required to be effective. Survey information needs to be updated in line with SSSI designation.		✓
3.	The importance for a number of habitats / species has been underrepresented in the ES. For example, the breeding bird population has been assessed as regional importance when the site has been identified as a SSSI for its breeding bird population. Underrepresenting the importance of a species or habitat will risk it not being giving full consideration.		✓

4.	All impacts from the proposed development have not been fully assessed within the ES Including: • Installation of pipeline (goes through areas of retained habitat) • The surface water drainage requirements – utilises the existing marsh areas which are also required for ecological mitigation. • Loss of features/habitats within the retained habitat area to create replacement habitats • The geology and hydrology surveys are incomplete therefore associated impacts are not fully understood or assessed within the ecology chapter. • Sufficient consideration of impacts due to increased noise, vibration and lighting important and protected species populations and assemblages have not been fully assessed. • Impacts from increased recreational pressure on small areas of retained habitat. The impacts on the species, habitats, designated sites may be under assessed and therefore the proposed mitigation/compensation may not be achievable or sufficient. The ES needs to be updated to properly take into account these considerations.		✓
5.	No information has been provided about the offsite mitigation areas. It is currently not understood if the location is appropriate, if the area of mitigation/compensation required can be created, if the habitat can be created within those sites and if it is achievable within the required time frame.		✓
6.	There is confusion over the use of the concepts of avoidance, mitigation, enhancement and compensation measures within the ES. The description of mitigation, compensation, and enhancement measures within the EcIA must be sufficient to allow the competent authority and relevant stakeholders to see clearly how effects will be addressed.		✓

	Landscape Strategy & Illustrative Landscape Plan	**Clarification**	**Additional Assessment Information**
1.	The Landscape Strategy should be secured by requirement, as the implication is currently that this substantial document is illustrative only.	✓	
2.	The mitigation planting to the Resort Gate boundaries is unclear and is stated to be '*wherever space allows'*. Resort boundary planting should comprise a minimum 10m wide woodland belt, outside of the Resort Gates,		✓

	Landscape Strategy & Illustrative Landscape Plan	Clarification	Additional Assessment Information
	along the boundary with both Black Duck Marsh and Broadness Marsh. Species and advanced nursery stock should also be proposed, to ensure a degree of screening.		
3.	The vegetation loss, location of attenuation basin and proposed mitigation at the A2 junction adversely impacts on the Ebbsfleet gateway planting. Clarification is required as to the extent of vegetation loss, and greater consideration of the existing planting design announcing the Garden City, is required within the mitigation proposed.	✓	✓
4.	Mitigation planting for vegetation loss along the new access road is insufficient and should comprise new areas of scrub and woodland, in addition to the wildflower and trees proposed.	✓	
5.	Impact on users of public footpath DS1 as it passes through a narrow pinch point between Gate 1 and the ferry terminal is a concern. More space for mitigation planting to screen the resort boundaries from this section of footpath is required.	✓	
6.	Hotel 4 is almost twice the height of the other 3 hotels at 128m, with no rationale provided for this height. Figure 8.12 of the Design Code illustrates this hotel as being substantially lower, whilst ES Chapter 3 states hotel 3 will be 128m high. Clarification is required and the overall height should be reduced, in line with the other hotels.	✓	
7.	The Foadarche in the arrivals plaza is 130m tall and as the tallest element, increases the already substantial visual envelope of the scheme (exacerbated by illumination of the structure). It also adversely impacts on the setting of the Grade II* All Saints Church and on the skyline of views from Swanscombe Heritage Park. The applicant should seek to reduce the parameter height.	✓	
8.	Parts of Gate 1 are shown at 70m, 80m and 100m heights, whereas Gate 2 heights are 35m and 65m. The parameter heights for Gate 1 should be reduced to 65m in line with Gate 2.	✓	
9.	There is a concern that both the arrivals plaza Foadarche and Gate 1 parameter heights, if approved, could allow for solid mass buildings within these work areas. Clarification is required that only 'themed rides' within Gate 1, and a 'loose structure' within the plaza extend up to the maximum parameter heights, with any solid mass buildings within the same Work area, being of a lower parameter height	✓	✓
10.	Routes and Roads section does not set out minimum widths for soft verges or indicate tree planting along key routes. The Design Code should be amended to allow for 2.4m-4m wide soft verges to Types F, I & J, and a commitments to tree lined streets. The retained London Road should also be added.		✓
11.	Fences and Edges section does not align with the Landscape Strategy and does not allow sufficient space for the required mitigation planting to be implemented, in particular along Black Duck and Broadness marshes interfaces).	✓	

	Landscape Strategy & Illustrative Landscape Plan	Clarification	Additional Assessment Information
12.	Gate 1 Back of House, and Fences and Edges sections or this area, do not include the new woodland proposed along the southern boundary of Gate 1 Back of House (as shown in the Landscape Strategy).		✓
13.	Low quantum of open space serving the Staff Accommodation. Clarification required that this housing is policy compliant and meets minimum open space standards.	✓	
14.	The visual effect on VP41 within the Kent Downs AONB is considered slightly downplayed, and is likely to be moderate adverse and significant (based on a low magnitude of change, rather than very low).	✓	
15.	The landscape effect on the Marshland Local Landscape Character Area is stated to be moderate adverse at year 1, and moderate beneficial at year 15. The latter is considered substantially downplayed and would likely remain adverse rather than beneficial.	✓	
16.	The effect on Habitats and Planting is stated as major/moderate adverse at year 1, and major/moderate beneficial at year 15. The latter is considered over-stated and the mitigation is inadequate, relying on a theoretical off-site scenario of mitigation planting. No detail of the type or quantum of mitigation planting proposed on site.		✓
17.	The visual effect on users of Galley Hill Road (VP5) is stated as major beneficial for high sensitivity residential and pedestrian receptors, yet moderate adverse for low sensitivity road users. This is considered over-stated and should be moderate – major adverse for all users.		✓

	Heritage and Archaeology	Clarification	Additional Assessment Information
1.	In general insufficient historic environment assessment and archaeological field evaluation has been undertaken (see ES Ch 14 and accompanying documents) to be clear about the significance of heritage assets within the Kent Project Site part of the application site and the impact of the proposals upon them. Further evaluation should be undertaken before the end of the Examination period. It is not possible on the basis of the information provided to be confident that there are no adverse impacts on significant heritage assets.		✓
2.	The proposals as currently set out will have an impact on internationally important Palaeolithic archaeological remains and Pleistocene geological remains at Bakers Hole SSSI and Scheduled Monument and adjacent non-designated archaeological remains as a result of the planned main access road and light transit route ('people mover'). Field evaluation will help determine significance and then appropriate mitigation can be decided. At present the applicant has not demonstrated that a neutral state will be achieved post-mitigation.		✓

	Heritage and Archaeology	Clarification	Additional Assessment Information
3.	Industrial heritage assets in general have not been sufficiently well assessed or evaluated; evaluation is needed before the end of the Examination period. The JB White Portland cement works in particular will require further assessment and field evaluation; it is not possible to determine significance and impact until this has been undertaken. The impact of the proposals on this important industrial heritage could be strongly negative.		✓
4.	The proposed development will impact on buried archaeological remains within alluvial deposits on Swanscombe peninsula, but archaeological field evaluation has not yet been undertaken and significance cannot yet be determined. Based on adjacent areas nationally important archaeological remains could be present and the impact from the proposed development is likely to be very high.		✓
5.	The assessment provided by the applicant for marine and intertidal heritage assets is based only on desk-based assessment and field evaluation will be required to determine the significance of the archaeological assets in the marine and intertidal environment which are affected by the proposed works.		✓
6.	Further assessment is required for the built historic environment. Historic buildings and structures affected by the proposals require further assessment and survey and should be retained if possible. The impact of the proposals on the settings of heritage assets in the area should be thoroughly assessed.		✓
7.	Further assessment is required of the impact of the proposals on Roman remains adjacent to designated site of Springhead. Preservation in situ should be ensured for nationally important archaeological assets and for those of lesser significance where appropriate. The level of detail provided in the Archaeological Strategy is not sufficiently detailed.		✓
8.	A reconsideration of historic legibility (using the data within the HLC report) will allow a reconsideration of significance with much of the historic landscape character of the project area could be assessed as having Moderate significance and some areas could be defined as having High significance.	✓	
9.	The landscape plans show areas where trees/vegetation will be removed but no information is provided to confirm whether or not such hedgerows are historic. We recommend that it is clearly set out which historic elements of woodland and hedgerows (as defined by the Hedgerow Act) would be impacted by the proposals.	✓	
10.	A comprehensive understanding of the history and heritage of the site should be used to underpin any new designs in the public realm areas across the wider site. This should include buried archaeological remains as well as the visible historic environment.	✓	
11.	Appropriate provision to respect the cultural heritage of the site should be a pervasive consideration in the design of the proposed development. The industrial period is probably the most visible in the site and surrounding landscape but earlier periods should also be considered in in terms of the contribution they make to the character of the area.		✓

	Noise and Vibration	Clarification	Additional Assessment Information
1.	**Construction Noise Impacts** Table 15.15 of the ES indicates Major Adverse unmitigated construction noise impacts at Receptor location 1 (residential properties at the eastern extent of Greenhithe) during Gate 2 construction. Potential impacts are described as “short-term” (ES Paragraph 15.85), but there is no indication what duration the Applicant considers to be short-term. This needs to be confirmed to better understand the impacts and mitigation measures required.	✓	
2.	Paragraph 15.105 of Chapter 15 of the Environmental Statement concludes that construction traffic is “not considered a significant noise issue”. However, this conclusion is based on data presented in ES Ch15 App15.3 Table 15.3.28, which appears erroneous. On most road links, the data indicates that the number of HGV movements is lower in 2023 (during worst-case construction of Gate 1) than the baseline 2018. The Applicant should justify why it expects HGV movements to be lower in this scenario than in the 2018 baseline or otherwise clarify this element of the assessment.	✓	
3.	**Operational Noise Management** There is no apparent mechanism for securing mitigation for operational road traffic noise on the new access road. These measures are highlighted in ES Ch22 ‘Conclusion and mitigation commitments’ Table 22.1, however this table erroneously stipulates that the securing mechanism would be via the CEMP, which only applies to the construction phase. The Authorities require the proposed mitigation measures to be submitted to the examination to enable it to be appropriately considered by the Authorities and other interested parties and necessary mitigation secured.		✓
4.	Given the multitude of possible attractions and events that may be held at the Kent Project Site, the Authorities consider it imperative that there is an agreed Operational Noise Management Plan to provide a framework of noise management and control measures. It is recommended that a DCO requirement is included that requires a draft Operational Noise Management Plan be submitted by the Applicant and agreed with the Local Planning Authorities. It is also appropriate to establish a development consent obligation for an annual independent audit of the Operational Noise Management of the site, to be submitted to the Local Planning Authorities as part of a monitor, manage and mitigation of "harms" process.		✓

	Air Quality	Clarification	Additional Assessment Information
1.	**Air Quality Assessment – Construction** Appropriate mitigation has been outlined within the ES following best practice to ensure that the construction impact is minimised. However provision of a detailed Dust Management Plan has not been confirmed and should be secured through a DCO requirement to ensure that one is submitted to and approved in writing by the relevant planning authority for each construction phase of the development to ensure appropriate mitigation is in place to address the known construction activity.	✓	
2.	**Air Quality Assessment – Operational** The number of monitoring locations used to calculate the verification factors appears to be low compared to the number of monitoring locations available in the modelled domain. A more detailed explanation with regards to the scoping methodology used to remove the monitoring locations would be beneficial to understand how the verification factors have been decided. Without this information, it is not possible to determine the effect at receptors.		✓
3.	There are a number of PM continuous monitoring stations within Dartford and Gravesham. The Authorities query whether these have been reviewed by the Applicant in order to generate a PM specific verification factor? This is required to understand impacts.		✓
4.	Due to the uncertainty surrounding the verification process, which underpins the outcomes of the dispersion modelling work, understanding the RMSE value of the verification process would help to strengthen the confidence in the model.		✓
5.	A uniform surface roughness value of 0.3m (equivalent to agricultural areas) has been used across the entire modelled area. The Authorities would wish to see sensitivity testing around surface roughness been undertaken particularly in the context of the varied land use within the modelled area (areas of water, marshland but also highly urbanised areas)? Has a variable surface roughness file been considered?	✓	
6.	**Air Quality Assessment – Vessel Emissions** The vessel emissions assessment is limited to a screening of moving vessel emissions and there is no consideration of emissions from moored vessels. Further clarity is sought over the extent of which the vessel movements will change between the construction and operational periods when compared to the baseline and a clearer understanding on the effect of these activities on residential and ecological receptors.		✓
7.	In addition to the above, we would request further information on emissions from the cruise liner which is proposed as static accommodation for the construction workers on the scheme. If this is to be powered remotely through the use of an auxiliary engine this may need consideration in the air quality assessment.		✓

	Air Quality	Clarification	Additional Assessment Information
8.	The assessment did not reference vessel emission estimates provided for the development area in the LAEI and further information is required to understand how the numbers within the assessment were derived	✓	
9.	**Air Quality Assessment – Ecological** The assessment stated that a number of ecological sites exceeded the 1% of the minimum critical load criteria for ambient NO_x and nitrogen deposition. These ecological sites were highlighted to the project ecologist. More information detailing whether the project ecologist is satisfied with the level of impact is required.	✓	
10.	Clarity is also required regarding the units used in the assessment. In Table 1 of Appendix 16.5, the 'Maximum Road Contribution NO_x' is given in 'µg/m³' but then expressed as a % of 'kg n/ha/yr'. Clarity is sought as to whether this is mislabelled or the wrong unit has been used for the purpose of calculation of the effect on ecological receptors.	✓	
11.	It appears that the applicant has completed a 'nutrient nitrogen' deposition assessment from roads but not an 'acid deposition' assessment. Further commentary on why this has been screened out or the results of acid deposition from roads at ecological receptor sites is requested.		✓
12.	**Air Quality Assessment – Energy Centre** The annual emissions were adjusted by a factor of 0.04 which suggests the boilers will only be active for 14 days of the year. Confirmation that this is the expected operational regime and the boiler use will not exceed this is required. If the boilers are only to be used for back-up purposes and the 14 days of operation represents only routine testing of the generators are details of this testing regime known?	✓	

	Lighting Impacts	Clarification	Additional Assessment Information
1.	**Lighting Assessment- Construction Phase** There is reference to limited operating hours in outline CEMP within the Lighting Strategy, but no hours are specified in the CEMP. We would request clarification as to these operating hours to determine whether there would be a period of darkness.	✓	

	Water Resources and Flood Risk	Requires Clarification	Further Environmental Information required
1.	**Water Resources and Flood Risk – baseline assessment** The general text description and overall strategic drainage strategy plan is not sufficiently detailed to demonstrate the works which are to be undertaken. A full assessment of impacts cannot therefore be undertaken and mitigation measures confirmed as adequate.	✓	
2.	Estimates of catchment discharge rates and volumes are not substantiated by calculations. The percentage increase in contributing catchment areas does not account for the changes in the receiving marsh areas, specifically considering the reduction in areal extent of Botany Marsh. The statements are not sufficient to demonstrate that water levels and volumes within Botany and Black Duck Marshes can be managed within the marsh without impact on local ecology. The discharge rates quoted will result in significant channelisation, increase water volume exchange, reduce salinity, increased velocities and possible increased scour. This increase in surface water will not promote a slow and brackish water environment as required and will result in significant environmental impact.	✓	✓
3.	There is a lack of detail in relation to outfall arrangements and how water is to be managed within the marsh areas. Surveys have not confirmed outfall locations.	✓	
4.	The water quality assessment does not assess the mitigation measures against the pollution hazards in any methodical way or reflect good practice as presented in the CIRIA SuDS Manual. There is no assessment of ADT to evidence the assessment of low traffic and low water quality impacts.	✓	
5.	The Surface Water Drainage Strategy does not include any information pertaining to development phasing and associated temporary drainage provision or infrastructure phasing. There is no certainty that surface water or pollution will be managed appropriately, and flood risk will not be exacerbated within the local area.	✓	
6.	Information must be provided as to the ongoing maintenance and management responsibilities. This will be important in relation to the management of water levels and drainage systems in the marsh area and specifications for vegetation control. Maintenance requirements for all proposed elements of the drainage system including green roofs, soakaways etc must also be outlined.	✓	

	Materials and Waste	Clarification	Additional Assessment Information
1.	**Assessment of Sensitivity of receptors (Kent landfill)** The Authorities are concerned that the data cited for Kent inert landfill capacity and forecast rate of depletion over the Kent Minerals and Waste Plan period (para 19.32 & 19.111, tables 19.25-26 APP 068) taken from the 2017 KCC Waste Needs Assessment (CD&E WNA, BPP 2017), are incorrect as they refer to the 2010 data used to inform the previous version of the Plan (WNA Table 23), and not the updated figures and assessment (WNA Table 24). The up-to-date figures indicate a much larger likely depletion of 84% (even taking account of the greater void space) confirming that the sensitivity would be 'very high' but also a potential larger adverse effect on the receptor.	✓	
2.	**Safeguarding of Mineral Resources, and Minerals and Waste Infrastructure** The Order limits cover a Mineral Safeguarding Area, defined in the Kent Minerals and Waste Local Plan and to which national and local safeguarding planning policy applies. There are 2 safeguarded minerals wharves in proximity to the Order limits (Robin's Wharf and Northfleet Wharf to the immediate east of the DCO boundary). There are also a number of waste facilities in Manor Way Business Park that are safeguarded by Kent Minerals and Waste Local Plan policy, which would be lost, along with the waste management capacity, due to the proposed development. The supporting documentation does not appear to address safeguarding of mineral resources, waste facilities or mineral transportation and processing facilities, and any mitigation measures.	✓	
3.	**Material supply** KCC is concerned that the estimates of demand for material appear rudimentary (Tables 19.36-37 APP 068) and also that consideration does not appear to have been given to supply of aggregates from marine-dredged (sand and gravel) or imported (rock) sources (delivered by ship to the adjacent aggregates wharves). A more comprehensive supply audit should be prepared with delivery of marine dredged material and/or imported aggregates to the adjacent wharves being the preferred option.	✓	
4.	**On-site management of waste** The Project Description (Para 3.57 APP-052) refers to the dedicated Materials Recovery Facility and Anaerobic Digestion Plant on a 1ha parcel on the northern part of the site, and the and DAS (Fig 6.74 APP-436) refers (more ambiguously) to a 'waste treatment facility'. However, there is no reference to this in the Outline Operational Waste Management Strategy (APP-214) even though this facility will be essential in reducing the amount of waste requiring export for treatment and disposal. Clarification is needed on the commitment to develop this facility and ensure it is operational prior to the resort development becoming operational.	✓	

	Materials and Waste	Clarification	Additional Assessment Information
5.	There should be a commitment to establishment of the 'Remediation Processing Compound ('soil hospital') (Para 3.4 APP-205) prior to excavation works commencing, as this will be essential in maximising the amount of material that may be re-used on site and so avoiding export and reducing potential effects on landfill.	✓	
6.	**Clarification of quantities of waste to be managed off-site and terminology** Key data should be summarised in a consolidated table, setting out the amount (tonnage and m^3) of each waste stream (construction, demolition, excavation, operational), estimated to be generated before and after mitigation, the proportions assumed to be 'inert', 'non-hazardous' and 'hazardous' and the assumed/likely waste management route for each type of material, particularly residual material requiring off-site management (inert landfill, non-hazardous landfill, hazardous landfill, other recovery).	✓	
7.	Para 19.86 APP-068 states that 'inert waste is assumed to be CDE waste and non-hazardous waste is assumed to be LAWC and C&I waste.' However, Table 2.3 APP-215 provides a different estimated breakdown on 'inert' and components of excavation waste, while Table 2.5 provides a breakdown of the components of construction waste.	✓	
8.	Table 19.35 APP-068 identifies that 'development inert waste before mitigation approx.. 362,000m^3'. Source of this figure is unclear as it figure does not feature elsewhere in this document. The term 'development inert waste' is inconsistent with the Table title that implies CDE waste, with a much greater volume of demolition and excavation waste in particular likely to be 'inert'.	✓	
9.	Table 19.43 of APP-068 identifies estimates of total hazardous waste arisings as 265,394m^3 (including 262,640m^3 excavation, 2,754m^3 C&D). This breakdown is under the 'operational' section but these arisings will be from the construction phase, the CDE figures are slightly inconsistent with those in the assessment of the Construction phase in the OCWMP (doc ref 6.2.19.2).	✓	
10.	Given the large amount of excavation waste that will be generated (Table 2.3 APP-215), the assumptions about the proportions likely to be in different categories, and the amount of mitigation (40% re-use on site) are critical. Further explanation of the basis for the assumptions that are currently based on 'professional judgement' should be given to provide a greater degree of confidence that these assumptions are realistic.	✓	

	Sustainability Strategy	Clarification	Additional Assessment Information
1.	**Design and Access Statement** *The Design and Access Statement (doc ref 7.1) needs to reflect the sustainability objectives set out within the Outline Sustainability Strategy (doc ref 7.7)*	✓	
2.	**GHG emissions and climate resilience** No microclimate study is included in the Design and Access Statement, illustrating sun path and wind directions. An assessment of how the proposed buildings respond to solar gain is not possible.		✓
3.	Clarity sought on the rationale and the relationship behind the location of Hotel 2 directly in front of the London Resort Ferry Terminal and the relationship with large multistorey car parks flanking the main entrance with the public transport interchange, which appears to conflict with promoting sustainable transport to and from the Resort.	✓	
	Design Code		
4.	Confirm how cyclists are provided for within the Design Code, in terms of segregated cycle routes, cycle parking and support facilities for cyclists.	✓	
5.	Clearly explain the interrelationship between the ambitions of the Sustainability Strategy which ought to be reflected in the Design Code.	✓	
	Utilities Statement		
6.	**Water Resources and Flood Risk — Utilities Statement** The business as usual targets taken from the Utilities Statement are inflated and not based on current practices. The residential benchmark of 150 l/resident/day is for instance above current building regulations Part G of 125 l/person/day. This needs to be updated.	✓	
7.	Concerns about lack of climate resilience consideration in landscape design due to high post establishment irrigation demand of 55% of the establishment demand. Measures that will reduce this need to be provided?		✓
	Outline Sustainability Strategy		
8.	The Outline Sustainability Strategy states that the London Resort Project aims to be 'ground-breaking environmentally and socially'. Confidence in the Resort's ability to deliver this ambition is reduced by the lack of, commitments to specific solutions and innovations. Robust Key Performance Indicators (KPIs), specific, measurable targets particularly around resource efficiency and biodiversity need to be established.	✓	✓

	Sustainability Strategy	Clarification	Additional Assessment Information
	Land Transport - ES Chapter 9		
9.	One of the main concerns is the lack of consideration and integration of sustainable and active transport within the proposal. The focus of the transport approach lies on private car use and lacks future thinking within a societal movement towards the electrification of transport. This approach lacks any real justification and should be fundamentally reviewed.		✓
10.	Further clarification required around the prioritisation of active travel (cyclists, pedestrians) within the proposal and connectivity for pedestrians and cyclists to the wider context.	✓	
11.	ES Chapter 9 fails to link the qualitative assessment of pedestrian/cyclist connectivity that has been undertaken as part of the Walking and Cycling Strategy contained in the Transport Assessment (document reference 6.2.9.1, section 10 – Walking and Cycling Strategy) to a clear arrival strategy for cyclist and pedestrians on site (bicycle parking, facilities, prioritised routes, etc.).		✓
12.	ES Chapter 9 does not mention electric charging provision for car parking of visitors or staff.		✓
	Land Transport – Transport Assessment *Lack of placing the strategic approach within the future context of electrification of mobility and shared modes of transport.*		
13.	The phase 1 Car Park on the Essex Project Site Car Park will accommodate 19 EV charging bays within an overall 1,392 standard parking spaces. This is less than a 1.4% provision and should be updated to accommodate minimum suggested standards.	✓	
14.	No apparent Electric Vehicle Charging is provided for Kent project site car parks. Please clarify and justify.	✓	
	Water Resources and Flood Risk – ES Chapter 17		
15.	*The main concern is that overall water reduction targets are too general and business as usual benchmarks not in line with current industry practice. There is no site wide approach to alternative sources of water and water re-use and proposed per-building re-use of greywater is missing consideration.*		✓
16.	A general reduction target of 25% from business as usual across all uses on the London Resort is too generic to assess the magnitude of proposed savings within current best practice and water saving requirements. The assessment should be updated.		✓

	Sustainability Strategy	Clarification	Additional Assessment Information
17.	Targets associated with water demand reduction during construction and enabling works have not been specified.		✓
18.	The development is lacking a comprehensive analysis of potable and non-potable water demands across the site and potential sources (quantified) of potable and non-potable water.		✓
19.	The proposal lacks a comprehensive approach towards metering and monitoring of water use, and leak detection.		✓
	Waste and Materials - ES Chapter 19		
20.	ES Chapter 6 paragraph 6.23 states "The EIA has not assessed decommissioning because the London Resort is intended to be a permanent development and consideration for decommissioning at this stage would be too hypothetical to be meaningful." It is recognised that there is difficulty in defining end of life for long term assets such as infrastructure and buildings, however end-of-life consideration are fundamental to achieving a Circular Economy. This needs to be addressed and reassessed.		✓
21.	Paragraph 19.18 states "anticipated volumes of key material requirements during the construction phase have been based on architectural land use plans", however material estimates in Table 19.34 only considers five materials; steel, concrete, asphalt, aggregates, concrete and timber and material demands do not align with construction waste streams identified in Table 2.5 in the OCWMP (doc ref 6.2.19.2). Further details on materials associated with these waste streams are needed.	✓	✓
22.	Table 19.31 requires justification for the identified material receptors sensitivity.	✓	✓
23.	CDE diversion from landfill 90% target cannot be considered best practice for large project.	✓	
24.	Paragraph 19.123 indicates that Construction, Demolition and Excavation (CDE) waste is likely to be mostly inert – soils, stone, concrete, brick, tile, while this may be valid for the demolition and excavation waste volumes, this statement should be reviewed in light of the construction activities proposed for the development itself. Further clarification is needed.	✓	
25.	Paragraph 19.125 states that construction waste estimates exclude waste from Gates 1 and 2 due to lack of detail in the DCO application and it is suggested that a focus on off-site prefabrication means minimal waste will	✓	

	Sustainability Strategy	Clarification	Additional Assessment Information
	be generated. The lack of detail within the DCO application is not a valid reason for excluding construction waste estimates from the Environmental Statement. Further clarification is needed.		
26.	Paragraph 19.127 states “approximately 40% of excavation waste is expected to be suitable for on-site reuse, 25% may be hazardous and the remaining 35% is expected to be inert or non-hazardous waste that is to be treated elsewhere.” Given the proposed soil hospital on site, 40% reuse of excavated materials onsite is not considered a sufficiently ambitious target and indicates that insufficient efforts have been made to achieve a cut/fill balance across the site. Further clarification is needed.		✓
27.	Indicates that 680,000 tonnes of aggregate will be imported for engineered fill - please confirm why there is not a more focus on the remediation and reuse of excavated spoil to meet demands for engineered fill on site. Further clarification is needed.	✓	
28.	Table 19.32 indicates 74,300 tonnes of construction waste is expected to be generated, this indicates a construction site wastage rates of 2.5% (using the 2.8million tonnes of material imported identified in Table 19.34). This is exceptionally low compared to industry average data (with construction site wastage rates often in excess of 10%). The Outline Waste Construction Management Plan (OCWMP) (doc ref 6.2.19.2) is not considered sufficiently ambitious or innovative to justify this low level of wastage. Further clarification and information is needed.	✓	✓
29.	The magnitude of impact of the key materials is considered on a UK wide basis, however aggregates and concrete are generally sourced local to a site. Please provide a justification for this approach.	✓	
30.	The assessment only considers impact on landfill - what about the capacity of recycling facilities to accept and reprocess the indicated waste streams? . Further clarification and information is needed.		✓
31.	Paragraph 19.170 indicates that non-recyclable CDE waste will likely be sent outside of Kent and Essex for incineration, yet the impact analysis has not considered the impact of the Resort construction on landfill capacity beyond the Kent and Essex boundary.		✓
32.	Paragraph 19.13 states “Operational material demands, including natural resources such as compost for landscaping purposes, will be assessed at a later stage in design when data is available from the associated landscape architect.” Due to the extent of landscaping proposed, compost could represent a significant quantity of materials, and while generally of low carbon intensity, these high bulk materials may result in a large number of vehicle movement. Please provide a justification for this approach.		✓
33.	The operational waste estimates do not consider green waste from landscape management, nor do they include quantities of sewage sludge from the on-site wastewater treatment plant (although the latter is referred to but not quantified). Even with these omissions, almost 50% of operational waste produced is estimated to be organic and given the operational need for compost (not yet quantified) it is not clear why in-vessel composting has not		✓

	Sustainability Strategy	Clarification	Additional Assessment Information
	been considered as part of the local waste management provision on site. Further clarification and information is needed.		
34.	Paragraph 19.171 indicates that non-recyclable operational waste will likely be sent outside of Kent and Essex for incineration, yet the impact analysis has not considered the impact of the Resort construction on landfill capacity beyond the Kent and Essex boundary. Further clarification and information is needed.		✓
	Outline Waste Construction Management Plan (OCWMP) *In general, the OCWMP presents no innovative thinking around construction waste management.* *Waste reduction measures listed and diversion from landfall are aligned with industry standards.*		
35.	The Outline Waste Construction Management Plan (OCWMP) does not adequately address how demolition will be undertaken to maximise the opportunities for onsite reuse and recycling of waste. Further clarification and information is needed.		✓
36.	It is noted that BRE benchmarks have been used to develop waste estimates. Given the nature of the Resort development are these benchmarks robust? . Further clarification is needed.	✓	
37.	The table indicates considerable brick waste - given the nature of construction works please explain the rationale for brick waste. . Further clarification is needed.	✓	
	Outline Operational Waste Management Plan *In general, the OOWMP presents no innovative thinking around operational waste management.*		
38.	The Outline Operational Waste Management Plan does not provide any analysis or subsequent targets for waste diversion from landfill yet Tables 19.50 and 19.51, ES Chapter 19 indicate that the magnitude of impact on landfill void capacity is reduced from major to minor in both Kent and Essex. Further clarification and information is needed.		✓
39.	Paragraph mentions possibilities to transport waste by barge - have riverside re-processing facilities been identified? If road transport is used - where are the nearest re-processing facilities?	✓	✓
	Contaminated Land		
40.	Most of the cut for the Resort Access Road is in landfill (Zone 6-9). Has an extensive programme of landfill mining and rationalisation been considered for the landfill across the site rather than simply remediating those areas of landfill associated with infrastructure or other works? Further clarification and information is needed.	✓	
41.	Makes reference to a soil hospital - where will this be located on site?	✓	

	Sustainability Strategy	Clarification	Additional Assessment Information
	ES Chapter 20 - GHG Emissions Impacts		
42.	The overall approach taken to assess and evaluate the significance of the Proposed Development's GHG emissions is of concern. The current approach results in both a substantial underestimation of the scale of the project's lifecycle GHG emissions and also to a misrepresentation of their magnitude of impact and overall significance. Until the assessment is updated in line with all the following comments, the conclusions of the assessment cannot be relied upon.		✓
43.	The project's construction GHG emissions are underestimated due to key contributing GHG sources and project activities being excluded from the carbon footprint assessment. The carbon footprint analysis must be revisited and include all the relevant emissions to allow the Authorities to evaluate the associated impacts and significance effect.		✓
44.	The carbon assessment has only considered the net change in the site's carbon sequestration potential during the 60 year operational life of the project (Par. 20.46 & 20.51). Construction works, within Zones 3A (Swanscombe Marshes) and Zone 4A and Zone 4D where the underlying alluvium and marshland have been identified as a potential source of ground gas (ES Chapter 18, Par. 18.82) could potentially release far greater quantities of carbon and therefore should be quantified.	✓	
45.	Key contributing GHG sources and project activities are absent from the operational carbon footprint assessment. The carbon footprint analysis must be revisited and include all relevant emissions.		✓
46.	Par 20.28 in ES Chapter 20 states that embodied carbon emissions (A1-A5) for buildings within Gate 1 & 2 have been excluded from the assessment. Given that "at least 60% of the attractions in the Gates will be located inside buildings" (see Par. 3.19 of ES Chapter 3), the embodied carbon of construction of Gates 1 & 2 must be included in the carbon footprint assessment.		✓
47.	In Table 2 of the Appendix 20.2 'GHG Calculation Inputs' the building floor area that has been used to estimate the construction embodied carbon is 781,868 m2 (the Table does not specify whether this is GEA or GIA). The project's area schedule excluding Gate 1 & Gate 2 is 1,034,719m2 GEA.	✓	
48.	In Par. 20.78 of ES Chapter 20 it is stated that operational water emissions are estimated based on an average total water daily demand of 6,581 m3/day (Par. 20.78). It is, however, unclear whether this includes the complete scope of all operational water uses, including unregulated water uses for the water park/swimming pools etc.	✓	
49.	In Par. 20.75 of ES Chapter 20 it is stated that operational energy emissions are based on a 'Principal Development power demand'. Clarification is needed on the scope of the estimated power demand and whether this covers all expected operational energy uses within the site's boundaries.	✓	

	Sustainability Strategy	Clarification	Additional Assessment Information
50.	Par. 20.96 of ES Chapter 20 states that the operational transport emissions associated with delivery vehicles has been quantified at 10,504 tCO2e over the 60-year lifecycle and that this takes into account the UK Government's target for net zero emissions by 2050. It also states that the electrification of the van fleet is considered from 2050 onwards. Clarification is needed on whether the power demand for electric vehicle charging of the van fleet has counted towards the development's power demand, increasing this demand and associated operational energy emissions of the development at 2050 onwards.	✓	
51.	It is not clear from the information provided, how the operational energy emissions from the use of gas have been quantified and considered in the assessment. Further information is required on the assumptions underlying the estimated gas usage and associated direct emissions.	✓	
52.	The methodology adopted for assessing GHG impacts have not contextualised GHG emissions and their magnitude (in mass). Contextualising GHG emissions against pre-determined carbon budgets is prescribed and recommended as good practice within IEMA's Environmental Impact Assessment Guide to: Assessing GHG emissions and evaluating their significance (2017, see IEMA - Par. 6.1 & 6.2, Box 4 and Figure 4). The ES should be updated to take account of this.		✓
53.	In Par. 20.38 the judgement is made to assign a 'High' sensitivity to the receptor (in this case the atmosphere), taking into consideration its 'value, vulnerability and reversibility'. It is proposed that the 'receptor sensitivity' be set to 'Very High'.	✓	
54.	There are inconsistencies in the approach used to evaluate the significance of impacts between what is prescribed in the Methodology ES Chapter 6 (Table 6.4) and ES Chapter 20 (Table 20.11). To avoid any confusion over the terminology for significance ratings, the carbon assessment must be consistent with the language and ratings used in Table 6.4. ES chapter to be reviewed and updated.	✓	
55.	**Mitigation of operational water impacts** The Authorities note the inconsistency between Tables 20.17 & Table 20.9 that needs clarifying. Table 20.9 set as the criterion for a 'Minor Adverse' magnitude of impact a performance equivalent to BREEAM Outstanding standard (2 credits and >25% reduction to baseline), whilst the commitment made in Table 20.17 is for BREEAM Excellent (1 credit and up to 25% reduction to baseline). The low ambition of regulated water reduction and statements made around the reduction of unregulated uses render the effect of the Resort as 'Minor' on operational water infrastructure. Further clarification and information needed to assess	✓	✓
56.	**Mitigation of construction and lifecycle embodied carbon impacts** Paragraph 20.58 states that the (incomplete) construction stage embodied carbon is 525,873tCO2e and 784,904 tCO2e. This is 1.5 times the development's 60-year operational energy emissions (estimated at 522,270 tCO2e, see Par. 20.75).The Applicant proposes to achieve a 10% reduction of construction stage embodied carbon		✓

	Sustainability Strategy	Clarification	Additional Assessment Information
	compared to the BAU baseline (Table 20.6) and to prepare a Draft Circular Economy Statement in Line with GLA guidance (Table 20.7).		
57.	**Mitigation of operational transport emissions** Based on the current carbon assessment results, operational transport emissions represent 2,605,170 tCO2e over the lifecycle. This is the highest contributing source of GHG emissions of the Proposed Development as currently quantified, yet the Applicant has put forward no binding or absolute targets of performance that would guarantee meaningful mitigation.		✓
58.	**Mitigation of operational energy emissions** The Applicant makes a statement to be 'net zero carbon' for operational energy, clarification is required as to the exact scope of emissions considered for the net zero strategy. Details for the monitoring and reporting of operational emissions is also required.	✓	✓
59.	ES Chapter 6 paragraphs 6.26-6.27 Table 20.14/20.17 & Table 20.19 note the commitment of the Applicant to net zero operational emissions, and the residual effect significance is rated as 'Negligible'. The Applicant should put mechanisms in place to guarantee the delivered performance of the development in response to the above hierarchy and targets, to satisfy the Authorities that the proposal is in line with the high-level ambition of the project Sustainability Strategy.		✓
60.	Appendix 20.3 Energy Strategy paragraph 4.8 & ES Chapter 20 paragraph 20.101 notes 20% improvement factor over Part L 2013, comprising 10% from fabric improvement, and 10% from other energy efficiency measures. This contradicts the 10% (residential) and 15% (non-residential) improvement factor over Part L 2013 in ES Chapter 20 paragraph 20.101 Table 20.17: Operation phase mitigation opportunities.	✓	✓
61.	The lack of a passive design approach at masterplan and building levels is expected to have a direct negative impact on energy demand and consumption calculations of Appendix 20.3 Energy Strategy. The applicant should consider such energy reduction measures and provide clear calculations showing the relevant energy and carbon savings for each building and attraction.		✓
62.	Appendix 20.3 Energy Strategy 4.7 does not present a detailed breakdown of the energy demand benchmarks used to estimate the Project Site heat demands, neither a detailed table of heat demand (kWh) per building and/or attraction, including all uses. Therefore, considerable uncertainty remains around the energy demand and consumption estimates, and how the proposed performance compares against space heating and cooling best practice metrics.		✓
63.	Appendix 20.3 Energy Strategy section 'Heat demand heat generating technologies' does not consider opportunities for reuse of waste heat to reduce heating demand and consumption. Such opportunities should be considered to achieve energy demand and associated GHG reductions in line with the Energy Hierarchy.		✓

	Sustainability Strategy	Clarification	Additional Assessment Information
64.	Appendix 20.3 Energy Strategy paragraph 5.2 does not clearly state whether cooling demand calculations have taken into account future weather scenarios and impact of temperature rise from climate change on cooling demand. Please confirm.	✓	
65.	Appendix 20.3 Energy Strategy paragraph 6.4 and paragraph 7.2 state that the energy and carbon reduction achieved through the provision of on-site renewables is 4% and 8% respectively. Additional on-site renewable energy generation opportunities should be sought, and a clear target set for on-site renewable energy generation.	✓	✓
66.	Appendix 20.3 Energy Strategy. The Energy strategy is missing a comprehensive Renewable Energy Feasibility Study for the project – the study should include both on-site and offsite opportunities with private wire connection.		✓
67.	No demand response measures such as thermal and/or power storage have been presented in Appendix 20.3 Energy Strategy. Demand response measures should be integrated into the design to reduce the impact of the proposed development on the national electricity grid infrastructure.		✓
68.	Appendix 20.3 Energy Strategy paragraph 7.8 notes that the purchase of carbon offsetting certificates can either partially or fully mitigate direct investment in an offsite renewable scheme. The Applicant must, as a minimum, deliver operational carbon reductions in line with Science Based Targets prior to relying on off-sites, or justify why this cannot be achieved.		✓
69.	Appendix 20.3 Energy Strategy paragraph 7.10 suggests that the proposal targets a 35% reduction of regulated emissions over Part L 2013. No further on-site carbon reduction targets are presented for the remaining 65% of the regulated emissions and for 100% of the unregulated emissions. The Authorities consider the 35% on-site regulated carbon reduction target lower than industry best practice, and not sufficient for the high-level ambitions of the project's Sustainability Strategy.		✓
70.	ES Chapter 20 paragraphs 20.26, 20.44, 20.47 etc. state that the calculation of baseline conditions uses the BEIS Greenhouse Gas Reporting: Conversion Factors 2020 for gas and grid electricity. This is not aligned with ES Chapter 20 Table 20.5 reference to the RICS Whole Life Carbon Assessment for the Built Environment, that suggests use of the Future Energy Scenarios published by the National Grid. Clarification over the methodology and the carbon factors of the future energy scenarios used is required.	✓	
71.	ES Chapter 20 paragraph 20.47 it is unclear whether the Future Baseline operational energy GHG calculations take into account the energy use and carbon emissions reduction stemming from building replacements throughout the 60 year period, in line with the Future Baseline embodied carbon GHG calculations assumption.	✓	✓
72.	ES Chapter 20 and Appendix 20.3 Energy Strategy do not clearly identify the operational emissions included in the assessment-lack of clarity on assumptions of the energy demand and use calculations, and additional information is required to satisfy the Authorities that the assumptions are appropriate and robust.	✓	✓
73.	ES Chapter 20 paragraph 20.100 does not present a detailed breakdown of the energy use and carbon emissions per building and/or attraction, including all uses, and comparison against energy intensity metrics. Therefore,		✓

	Sustainability Strategy	Clarification	Additional Assessment Information
	considerable uncertainty remains around the energy and carbon estimates. Additional information is required to satisfy assumptions are appropriate and robust.		
74.	ES Chapter 20 paragraph 20.100 does not clarify whether refrigerant leakage has been taken into account in the operational GHG calculations, to ensure the GHG impact of the development is accurately estimated.	✓	
75.	ES Chapter 20 paragraph 20.101 does not present the GHG emissions associated with operational energy of the 'Construction phase mitigation' scenario, before carbon offsets are implemented. These are necessary to assess the magnitude of impact of the proposed development.		✓
76.	**Mitigation of operational emissions** Key operational activities and the associated GHG emissions have been excluded from the carbon footprint assessment and their impacts have not been evaluated as part of the ES. Consequently, no mitigation measures or performance targets are put forward to ensure that all key operational emissions will be satisfactorily reduced.		✓
77.	**Additional Clarifications** Estimates of transport emissions during construction are based on Buro Happold's past project experience (see Table 5 of ES Appendix 20.2) with the emissions expressed in kgCO2e/£M Project value. Further information is needed on the type and scale of projects these estimates are based.	✓	✓
78.	The scale of the emissions associated with delivery and service vehicles for the Proposed Development (see Par. 20.95 & Par. 20.96) seems low compared to the Future Baseline emissions. As per the current analysis this is 10,504 tCO2e over the 60-year lifecycle for the Proposed Development and 570,044 tCO2e for the lifecycle of the Future Baseline, i.e. the Proposed Development appears to have emissions for deliveries and services that is only 1.8% of that of the Future Baseline (existing site uses, no land use change). Additional information is required regarding the methodology and the scope of the assessment	✓	
79.	Par. 20.47 the assumption for the future baseline energy profile is that the existing building stock remains as is and consumes the same amount of gas and electricity as in the baseline year. Whilst emissions of the future baseline reduce due to decarbonisation of the grid electricity, gas usage is assumed to remain the same throughout the study period. Within the study period (60 years), gas would be phased-out of the existing building stock, with buildings retrofitted with all-electric energy systems as part of a retrofit. It would be more accurate, therefore, to select a year for retrofit of those buildings and their like-for-like replacement (see Par. 20.49 where this assumption is made), with lower energy demand profiles and all energy use to be electricity from the grid from that point on.	✓	✓
80.	It is not clear from the information provided in Appendix 20.2 *Greenhouse Gas Calculations Inputs* which of the carbon factors from the Habitat40 guidance (published by Natural England) are assigned against the habitats identified by the ecologist for both the baseline scenario as well as the proposed development (see Greenhouse Gas Calculations Inputs 6.2.20.2 Tables 6,7,8).	✓	

	Sustainability Strategy	Clarification	Additional Assessment Information
81.	There is a discrepancy between the total scenario baseline area (ha) and the total combined area of enhanced and created land (ha) in the Proposed Development (see Greenhouse Gas Calculations Inputs 6.2.20.2 Tables 6,7,8). Please clarify this discrepancy.	✓	
82.	Further information is required regarding how the national commitment to no new fossil fuel cars beyond 2030 has been considered in both the baseline and project operational transport and operational energy emissions.	✓	✓
83.	Table 20.15 of ES Chapter 20 operational water emissions over the 60-year lifecycle are stated as 826 tonnes, however this figure only corresponds to one year of emissions as per Par. 20.81 (water emissions established at ~2.26tonnes/day and 825 tCO2e per year). Over the 60 year study period operational water emissions are 49,500 tonnesCO2e. This needs to be corrected in Table 20.15.	✓	
84.	**Climate change risk assessment and Climate Resilience** The adopted approach in assessing and evaluating climate change risks is simplistic and lacks the breadth that is required for a project of this scale, complexity and timescale. Table 20.21 of ES Chapter 20 presents the criteria for determining the consequence rating of an effect, which are a mixture of impacts to site users and the capacity of the development; impacts to the environmental receptors within the site are wholly absent.		✓
85.	Table 20.26 of ES Chapter 20 provides a summary of mitigation measures that 'will be implemented where appropriate to reduce climate change risks'. The Authorities are not satisfied that the proposed measures are comprehensive, specific or robust enough and that no further mitigation will be required.		✓
86.	For the hazard of drought, the proposed mitigation measures in Table 20.26 are not considered comprehensive or ambitious enough. The project as it currently stands will add substantial water demand to strategic/regional water supplies (in line with current estimates more than 2.4 million m3/annum) in a region that will increasingly become water stressed.		✓
87.	For the hazard of extreme hot days and heatwaves, the proposed mitigation measures in Table 20.26 are not considered comprehensive or ambitious enough. Mitigation measures for these hazards must be revisited to incorporate ambitious commitments and specific, binding performance targets.		✓
88.	Residual risks for the Proposed Development are presented in Table 20.27. Similarly to what was assumed for rainstorm, heavy snow, fog, hail, severe wind, extra tropical cyclone and storm surge we would expect the *probability* ratings for the hazards of drought, heatwaves, extreme hot days, cold waves and extreme winter conditions to remain unaltered between pre- and post-mitigation risk assessment. Mitigation measures could only lower the 'consequence rating' of these hazards as they would improve the project's resilience (i.e. lower its vulnerability and susceptibility), but not the probability of occurrence of the hazard. The probability of occurrence for these hazards wouldn't be influenced by the project specifics but rather London's weather and climate.	✓	✓

	Sustainability Strategy	Clarification	Additional Assessment Information
89.	The applicant’s statement that the in-combination effect of the development on drought is 'not likely to be significant' (Par. 20.124), in the absence of any further information. Additional information and justifications are required.		✓
90.	A correction is required in Table 20.25 for the risk rating heat waves, as it should be stated as 20 instead of 16.	✓	